



1155 Avenue of the Americas  
22nd Floor  
New York, NY 10036-2711

T +1.212.262.6900  
F +1.212.977.1649  
PerkinsCoie.com

September 27, 2022

Matthew J. Moffa  
MMoffa@perkinscoie.com  
D. +1.212.261.6857  
F. +1.212.399.8057

**VIA ECF**

Hon. Valerie Figueredo, Magistrate Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

**Re: *FCX Solar, LLC v. FTC Solar, Inc.*,  
Case Nos. 1:21-cv-03556-RA-VF, 1:21-cv-08766-RA (consolidated)**

**Joint Letter Motion To Stay Proceedings**

Dear Judge Figueredo:

I am counsel for Plaintiff FCX Solar, LLC (“FCX”). I write on behalf of FCX and Defendant FTC Solar, Inc. (“FTC”) regarding the captioned consolidated cases, referred to Your Honor for discovery and general pretrial purposes.<sup>1</sup>

A telephonic discovery conference before Your Honor is set for Thursday, September 29, 2022, at 3:30 PM. D.I. 160. All other deadlines in the case scheduling order are adjourned pursuant to Your Honor’s Order of July 18, 2022. D.I. 153; *see also* D.I. 158 (Order of District Judge Ronnie Abrams adjourning post-discovery conference *sine die*).

FCX and FTC have agreed to request a 30-day stay of these cases to allow the parties to work on settlement. There is good cause for this request. A brief stay will conserve party and Court resources and will allow the parties to focus their efforts on resolution of their dispute.

FCX and FTC thus jointly move pursuant to Local Civil Rules 5.2(b) and 7.1(d) for a 30-day stay of the captioned proceedings and an adjournment of the September 29, 2022 discovery conference until such time as the stay is lifted. This is the parties’ first request for a stay.

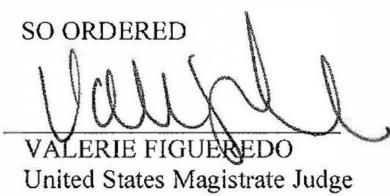
Respectfully submitted,

/s/ Matthew J. Moffa

Matthew J. Moffa  
Counsel for Plaintiff FCX Solar, LLC

9/28/2022

SO ORDERED



VALERIE FIGUEREDO  
United States Magistrate Judge

The discovery conference scheduled for 9/29/2022 is adjourned. Parties are directed to submit a letter with an update on the status of settlement by 11/2/2022.

<sup>1</sup> See D.I. 46 and order of April 26, 2022. All docket references herein are from the lead -3556 case.